

EXHIBIT 23

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE
VIRGIN ISLANDS,

Plaintiff,

v.

No. 22-cv-10904-JSR

JP MORGAN CHASE BANK, N.A.,

Defendant.

JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,
Third-Party Defendant.

THE ORAL DEPOSITION OF JOHN P. DE JONGH, JR.
was taken on the 30th day of May, 2023 at the Law
Offices of JOEL HOLT, 2132 Company Street,
Christiansted, St. Croix U.S. Virgin Islands, between
the hours of 9:02 a.m. and 4:46 p.m. pursuant to Notice
and Federal Rules of Civil Procedure.

Reported by:

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Registered Merit Reporter
Hill's Reporting Services
P.O. Box 307501
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1 A. The public newspaper accounts, yes.

2 Q. Of Jeffrey Epstein?

3 A. Yes.

4 Q. And that public reporting put you on notice
5 of the allegations surrounding his sex abuse?

6 MR. TEAGUE: Objection, form.

7 MS. BOGGS: Vague.

8 Q. (By Mr. O'Laughlin:) You can answer.

9 A. Those notifications put me -- educated me
10 to what he was accused of doing when he got convicted
11 in '8 or '9.

12 Q. In 2008 and 2009?

13 A. Right.

14 Q. So as of those dates, you knew the
15 accusations against Epstein?

16 MS. BOGGS: Objection, vague.

17 MR. TEAGUE: Objection, vague.

18 Q. (By Mr. O'Laughlin:) And did you -- you
19 were the governor at the time, correct?

20 A. Yes.

21 Q. Did you request an investigation of
22 Epstein?

23 A. As governor?

24 Q. Yes.

25 A. No.

1 Q. Did you contact USVI DOJ about Epstein?

2 A. No.

3 Q. Did you contact Florida police about
4 Epstein?

5 A. No.

6 Q. Did you contact Florida law enforcement?

7 A. No.

8 Q. Did you contact New York law enforcement?

9 A. As governor? No.

10 Q. Did you contact the FBI?

11 A. No.

12 Q. Did you direct anyone on your staff to do
13 any kind of investigation into Epstein?

14 A. I would not do that.

15 Q. Why not?

16 A. My assumption will be that the Department
17 of Justice, any of the entities dealing with Jeffrey
18 Epstein would have done that.

19 Q. Do you appoint the attorney general?

20 A. Appoint with advice and consent of the
21 legislature, yes.

22 Q. Are you in frequent communication with the
23 attorney general of the USVI?

24 MS. BOGGS: Objection, vague, time
25 period.

1 MR. TEAGUE: Same objection.

2 THE WITNESS: When you say

3 "frequent," what do you mean.

4 Q. (By Mr. O'Laughlin:) How frequent was your
5 communication with the attorney general of the USVI
6 while governor?

7 A. Whenever issues came up, they bring it to
8 my attention.

9 Q. How often would issues come up, do you
10 estimate?

11 A. I can't. I had more contact with other
12 commissioners on a day-to-day basis than with the AG.

13 Q. Would you talk to the AG once a week?

14 A. Sometimes. Sometimes I go two weeks
15 without talking to him. So it wasn't frequent.
16 That's why I meant, What do you mean by frequent?

17 Q. Well, I'm asking you, how frequent? I am
18 asking you maybe once a day, once a week, once a
19 month, four times a month?

20 MR. TEAGUE: Same objection. You
21 can answer.

22 THE WITNESS: Again, the frequency
23 I couldn't tell you. Sometimes I would
24 talk to him a couple times a month.
25 Sometimes I would not talk to him.

1 Q. (By Mr. O'Laughlin:) But if there was an
2 issue that required attention from the attorney
3 general, you would engage with the attorney general?

4 A. Yes. Definitely.

5 Q. And when there was an issue, you would
6 engage frequently, several times?

7 MR. TEAGUE: Objection, form.

8 THE WITNESS: Again, maybe.

9 Depending on the issue.

10 Q. (By Mr. O'Laughlin:) And at no point did
11 you ever request that the attorney general look into
12 Jeffrey Epstein, correct?

13 MS. BOGGS: Objection, vague.

14 THE WITNESS: That I would -- that
15 I initiate an investigation of Jeffrey
16 Epstein? No.

17 Q. (By Mr. O'Laughlin:) Did you make any
18 requests at any time to the attorney general to look
19 into Jeffrey Epstein?

20 MS. BOGGS: Objection, vague.

21 THE WITNESS: No.

22 MR. TEAGUE: Objection, form.

23 Q. (By Mr. O'Laughlin:) You mentioned that
24 your wife worked for Jeffrey Epstein. Did she know
25 him closely?